PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Meridian Automotive Systems
1890 Riverfork Drive West
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 069-5943-00043	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 17, 2001 Expiration Date: September 17, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official:	Wayne Fulghum, Plant Manager
Source Address:	1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address:	1890 Riverfork Drive West, Huntington, Indiana 46750
General Source Phone Number:	219-356-4461
SIC Code:	3089
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) automatic spray booth, identified as SB-M-Pr, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 4, capacity: 530 fiberglass reinforced parts per day.

(b) One (1) automatic spray booth, identified as SB-A-Pr, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 6 and EP 7, capacity: 530 fiberglass reinforced parts per day.

(c) One (1) splatter coat spray booth, identified as SB-M-S, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 3, capacity: 530 fiberglass reinforced parts per day.

(d) One (1) splatter coat spray booth, identified as SB-A-S, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 1 and EP 2, capacity: 530 fiberglass reinforced parts per day.

(e) One (1) mono coat spray booth, identified as SB-A-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 5, capacity: 530 fiberglass reinforced parts per day.

(f) One (1) mono coat spray booth, identified as SB-M-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 8, capacity: 530 fiberglass reinforced parts per day.

(g) One (1) natural gas fired hook oven, identified as AFT-1, installed in 1995, exhausted to Stack EP 10, rated at 1.1 million British thermal units per hour, capacity: 40 pounds of waste per hour.

(h) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.

(i) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.

(j) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.

(k) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.

(l) One (1) natural gas fired west plant air make up unit, identified as AMU-W, installed in 1987, rated at 12.6 million British thermal units per hour.

(m) One (1) fiberglass mat natural gas curing oven, identified as PFO-2, installed in 2001, exhausting outside the plant, rated at 2.39 million British thermal units per hour, drying a maximum of 440 pounds of fiberglass mat per hour.

(n) One (1) natural gas fired boiler, identified as 8409, equipped with low NO_x burners with flue gas recirculation, installed in 2000, exhausted through Stack EP 9, rated at 10.5 million British thermal units per hour.

(o) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.

(p) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.

(q) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.

(r) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.

(s) One (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, installed in 1999, exhausting to stack EP 13, rated at 2.39 million British thermal units per hour, with a throughput of 440 pounds of fiberglass per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically

regulated, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3)

(c) Activities with emissions equal to or less than the following thresholds: PM: five (5) pounds per hour or twenty-five (25) pounds per day:

Drilling, trimming, sanding of fiberglass reinforced plastic parts, capacity: 530 fiberglass reinforced plastic parts per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based

on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by

the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos

is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10.1 (a), (c), (d) and (e), emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63,

40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented

when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter

Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) automatic spray booth, identified as SB-M-Pr, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP4, capacity: 530 fiberglass reinforced parts per day.

(b) One (1) automatic spray booth, identified as SB-A-Pr, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP6 and EP7, capacity: 530 fiberglass reinforced parts per day.

(c) One (1) splatter coat spray booth, identified as SB-M-S, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 3, capacity: 530 fiberglass reinforced parts per day.

(d) One (1) splatter coat spray booth, identified as SB-A-S, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 1 and EP 2, capacity: 530 fiberglass reinforced parts per day.

(e) One (1) mono coat spray booth, identified as SB-A-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 5, capacity: 530 fiberglass reinforced parts per day.

(f) One (1) mono coat spray booth, identified as SB-M-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 8, capacity: 530 fiberglass reinforced parts per day.

(h) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.

(i) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.

(j) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.

(k) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.

(o) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.

(p) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.

(q) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.

(r) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to CP 069-1857-00033 issued November 10, 1990, and 326 IAC 8-1-6 (New facilities: general reduction requirements), Best Available Control Technology (BACT) for the six (6) spray booths identified as SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, and SB-A-S has been deter-

mined to be the following:

(1) The potential VOC delivered to the applicators shall not exceed 248.4 tons per twelve (12) consecutive month period.

(2) The above-named operations shall be restricted such that the VOC delivered to the applicators shall not exceed thirty (30) tons per month.

(3) The use of high transfer efficiency electrostatic application is required as a technology which will reduce VOC emissions. Therefore, the State and Federal Rules for Prevention of Significant Deterioration do not apply.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The six (1) surface coating booths, the eleven (11) molding presses, the one (1) natural gas-fired preform oven, and the one (1) natural gas-fired curing oven total VOC usage shall be limited to 239.2 tons per consecutive twelve month period, combined. This usage limit, combined with the full potential to emit VOC from the one (1) boiler, one (1) west plant air make-up unit, one (1) hook oven and all of the insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the total PM from the six (6) spray booths, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more from any of the eleven (11) reinforced plastic molding presses shall obtain prior approval from IDEM, OAQ.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

The waterwash system for PM control shall be in operation at all times when the six (6) spray booths are in operation.

D.1.9 Monitoring

(a) Weekly inspections shall be performed to verify that the water level of the water pans meet the source's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, quarterly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the source. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks EP 1 through EP 8 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack (EP 1 through EP 8) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2 and D.1.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a

log of weekly overspray observations, weekly observations of the water level in the pans quarterly inspections of water pans, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(g) One (1) natural gas fired hook oven, identified as AFT-1, installed in 1995, exhausted to Stack EP 10, rated at 1.1 million British thermal units per hour, capacity: 40 pounds of waste per hour.

(l) One (1) natural gas fired west plant air make up unit, identified as AMU-W, installed in 1987, rated at 12.6 million British thermal units per hour.

(m) One (1) fiberglass mat natural gas curing oven, identified as PFO-2, installed in 2001, exhausting outside the plant, rated at 2.39 million British thermal units per hour, drying a maximum of 440 pounds of fiberglass mat per hour.

(n) One (1) natural gas fired boiler, identified as 8409, equipped with low NO_x burners with flue gas recirculation, installed in 2000, exhausted through Stack EP 9, rated at 10.5 million British thermal units per hour.

(s) One (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, installed in 1999, exhausting to stack EP 13, rated at 2.39 million British thermal units per hour, with a throughput of 440 pounds of fiberglass per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), the allowable PM emission rate from the one (1) boiler, identified as 8409 shall not exceed 0.592 pounds per million British thermal units per hour when operating at 10.5 million British thermal units per hour heat input.

The emission limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the one (1) fiberglass mat natural gas curing oven, identified as PFO-2, and the one (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, shall not exceed 1.49 pound per

hour when operating at a process weight rate of 440 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more from either the natural gas curing oven, PFO-2 , or the natural gas preform oven, PFO-1 shall obtain prior approval from IDEM, OAQ.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the throughput weight of fiberglass mats through PFO-2 and PFO-1 and the percent resin content of the fiberglass.

(b) Pursuant to 40 CFR 60 Subpart Dc, the Permittee shall maintain daily records of the amount and type of fuel burned in 10.5 million British thermal units per hour boiler, 8409 pursuant to 40 CFR 60 Subpart Dc.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(c) Activities with emissions equal to or less than the following thresholds: PM: five (5) pounds per hour or twenty-five (25) pounds per day:

Drilling, trimming, sanding of fiberglass reinforced plastic parts, capacity: 530 fiberglass reinforced plastic parts per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing, cutting, soldering, welding and trimming, drilling and sanding operations shall not exceed allowable PM emission rate based on the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T069-5943-00043

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T069-5943-00043

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T069-5943-00043

9 Natural Gas Only **9** Alternate Fuel burned From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facilities: Six (6) spray booths
Parameter: VOC usage
Limit: Total of 248.4 tons per twelve (12) consecutive month period
Total of thirty (30) tons per month

YEAR: _____

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facilities: 6 spray booths, 2 warehouse booths, 11 molding presses, 1 preform oven, 1 curing oven
Parameter: VOC usage
Limit: Total of less than 239.2 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T069-5943-00043

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Meridian Automotive Systems**
Source Location: **1890 Riverfork Drive West, Huntington, Indiana 46750**
County: **Huntington**
SIC Code: **3089**
Operation Permit No.: **T 069-5943-00043**
Permit Reviewer: **Craig J. Friederich**

On May 25, 2001, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Meridian Automotive Systems had applied for a Part 70 Operating Permit to operate a high-pressure fiberglass-reinforced plastics manufacturing and painting source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On June 25, 2001, Wayne Fulghum of Meridian Automotive Systems submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

Except as noted under Section A, the general information items recited in Parts A and D are correct as amended from the preliminary draft. We appreciate and support statements in the permit that identify which language is "informational" and not enforceable, that clarify which provisions are not federally enforceable, and that specify which submittals require or do not require certification.

Response 1:

Thank you for you commendation on IDEM, OAQ's permit language. Therefore, no changes to the proposed permit are necessary.

Comment 2:

Please change the plant responsible person's name from Jon Janshego to Wayne Fulghum in Condition A.1.

Response 2:

Condition A.1 has been revised to list Wayne Fulghum as the responsible official as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official: ~~Jon Janshego~~ **Wayne Fulghum, Plant Manager**

Comment 3:

Item A.2(h) and (i) - Both warehouse booths, alpha and beta, are no longer in operation and have been removed. These two facilities should be deleted from the equipment summary:

Response 3:

Condition A.2 (h) and (i) as well as Section D.1 (h) and (i) have had the alpha and beta booths deleted and all subsequent equipment has been renumbered as well as in Section D.2. In addition Condition D.1.9 has been deleted and all references to these booths in Condition D.1.2, D.1.3 and D.1.10 (b) and (d) (now D.1.9 (b) and (d) have been deleted and the remaining conditions have been renumbered as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

~~(h) One (1) warehouse booth alpha, identified as S/ECB-Alpha, equipped with air atomization spray guns and dry filters as overspray control, installed in 1995, exhausted to Stack EP 11, capacity: 24 fiberglass reinforced parts per day.~~

~~(i) One (1) warehouse booth beta, identified as S/ECB-Beta, equipped with air atomization spray guns and dry filters as overspray control, installed in 1995, exhausted to Stack EP 12, capacity: 24 fiberglass reinforced parts per day.~~

(**h~~j~~**) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.

(**i~~k~~**) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.

(**j~~l~~**) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.

(**k~~m~~**) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.

(**l~~n~~**) One (1) natural gas fired west plant air make up unit, identified as AMU-W, installed in 1987, rated at 12.6 million British thermal units per hour.

(**m~~o~~**) One (1) fiberglass mat natural gas curing oven, identified as PFO-2, installed in 2001, exhausting outside the plant, rated at 2.39 million British thermal units per hour, drying a maximum of 440 pounds of fiberglass mat per hour.

(**n~~p~~**) One (1) natural gas fired boiler, identified as 8409, equipped with low NO_x burners with flue gas recirculation, installed in 2000, exhausted through Stack EP 9, rated at 10.5 million

British thermal units per hour.

(**o~~q~~**) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.

(**p~~r~~**) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.

(**q~~s~~**) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.

(**r~~t~~**) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.

(**s~~u~~**) One (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, installed in 1999, exhausting to stack EP 13, rated at 2.39 million British thermal units per hour, with a throughput of 440 pounds of fiberglass per hour.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The six (6) surface coating booths, ~~the two (2) warehouse booths,~~ the eleven (11) molding presses, the one (1) natural gas-fired preform oven, and the one (1) natural gas-fired curing oven total VOC usage shall be limited to 239.2 tons per consecutive twelve month period, combined. This usage limit, combined with the full potential to emit VOC from the one (1) boiler, one (1) west plant air make-up unit, one (1) hook oven and all of the insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the total PM from the six (6) spray booths~~, and the two (2) warehouse booths~~ shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

~~D.1.9 Particulate Matter (PM)~~

~~The dry filters for PM control shall be in operation at all times when the two (2) warehouse booths are in operation.~~

D.1.**9** ~~10~~ Monitoring

~~(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks EP 11 and EP 12 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to~~

~~Take Response Steps, shall be considered a violation of this permit.~~

(**b**~~c~~) Monthly inspections shall be performed of the coating emissions from the stack (EP 1 through EP 8) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

~~(d) Monthly inspections shall be performed of the coating emissions from the stack (EP 11 and EP 12) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

(**c**~~e~~) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Section B

Comments 4, 5, and 6:

We support the language in B.1 stating that the definitions of terms in the permit shall be identical to those in IDEM's rules. This will avoid any inadvertent confusion as to applicable requirements.

We support the concept in B.3 that those requirements, which are not federally enforceable, will be identified in the permit.

We support the statement in B.13(b) that previously this permit will supercede existing permits. Such action will avoid any confusion to possible differences in requirements or the specific way conditions were worded in the previous permits.

Responses 4, 5 and 6:

Your complements are duly noted and as such do not result in any changes to the proposed permit.

Comment 7:

Condition B.15(a) requires reporting of deviations from permit requirements on a quarterly basis. IDEM has flexibility in this regard to allow for semiannual reporting since the cited rule (326 IAC 2-7-5(3)(C)(ii)) required only "prompt reporting" and IDEM has the discretion to define "prompt". We request this requirement be reduced to a semiannual report to help minimize the reporting burden.

Response 7:

The cite for Condition B.15, 326 IAC 2-7-5(3)(c)(i), sets out the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. OAQ maintains that reporting deviations every six months is not adequate to ensure that the cause of any reoccurring deviation is corrected in a timely fashion. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

In addition, the source should be aware that six months is not the only deviation reporting time period required by 326 IAC 2-7-5(3)(C) (Permit Content). 326 IAC 2-7-5(3)(C)(ii)states "Notwithstanding requirements in this section, the reporting of deviations required by an applicable requirement shall follow the schedule stated in that applicable requirement."

Therefore, no change to this condition as a result of this comment.

Section C

Comment 8:

There appears to be a citation error in the second sentence of Condition C.7(e). Rules 326 IAC 14.10.1(a), (c), (d) and (e) specify the amounts of asbestos removed for which emission control procedures are required. The rule cited, 326 IAC 14-10-4, defines the types of emission control procedures.

Response 8:

Thank you for pointing out that the cite in second sentence of Condition C.7(e) should be 326 IAC 14-10.1(a), (c), (d) and (e) rather than 326 IAC 14-10-4. The cite has been changed as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per **326 IAC 14-10.1(a), (c), (d) and (e)** ~~326 IAC 14-10-4~~, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

Comment 9:

It is requested that frequency of General Reporting in C.18(a) be reduced from quarterly to semiannual (see comment 7 above)

Response 9:

Condition C.18 (a) states:

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. Therefore, no changes to the proposed permit are required.

Section D

Comment 10:

The language in Condition D.1.10(a), Monitoring, does not accurately reflect the plant spraybooth equipment and operations. Overspray (particulate matter) is controlled by means of a "flood sheet" or water wall which is continually wetted and drains into a weir box. The spraybooth exhaust impinges on the sheet and paint particles are entrained and washed into the weir. Water levels are controlled automatically by a solenoid level-monitor switch. Failure to maintain proper water level for this system interferes with production because it disrupts airflow balance in the booth, thus affecting the amount of paint sprayed reaching its contact part. Operators frequently monitor the water levels visually throughout the day to assure quality production. A detacking agent is added to the water to kill the paint particles and cause them to float on the surface. A skimmer continuously removes the scum to a receptacle for processing and disposal. After passing the flood sheet/weir, the spraybooth exhaust passes through a series of baffles on the backside of the booth, which are further controlled by a series of spray nozzles to eliminate more particulate and prevent build-up on the baffles. The baffles are fixed, welded in place, and not adjustable. These baffles are checked and cleaned on a quarterly basis. All this equipment was designed and fabricated internally, so Huntington is "the manufacturer". Given this scenario we request that paragraph (a) be rewritten to require:

(1) Weekly visual check and recordation of the water level in the weir

(2) Keep wash water free of solids and floating material

(3) Quarterly inspection and cleaning of the fixed baffles

(4) Quarterly inspection and maintenance of the baffle spray nozzles

(5) Follow the Compliance Response Plan, etc.

We request that the inspection of water wash levels be conducted and recorded weekly (not daily). As a reasonable and meaningful check on this important function, and that weekly observations of Booth Stacks EP1 through EP8 be dropped as non-effective (paint stacks do not have visible Plumes). The monthly rooftop inspections under paragraph (c) will provide a better indication of Overspray control.

Response 10:

Condition D.1.10(a) (now D.1.9(a)) has been changed to allow for quarterly inspections. Since the source is the manufacturer of this control system and they recommend, and have justified the adequacy of quarterly inspections the frequency of the required inspections has been changed as follows:

D.1.**9** ~~10~~ Monitoring

(a) **Weekly** ~~Daily~~ inspections shall be performed to verify that the water level of the water pans meet the **source's** ~~manufacturer's~~ recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, **quarterly** ~~weekly~~ inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the **source** ~~manufacturer~~. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks EP 1 through EP 8 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.**10** ~~11~~ Record Keeping Requirements

(b) To document compliance with Conditions D.1.**8**~~10~~ and D.1.**9**~~11~~, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans ~~daily and monthly~~ **quarterly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 11:

Condition D.2.4(b) requires daily records of boiler fuel type and amount. At present there is no way to determine the amount of natural gas burned by the boiler. A single, metered gas main supplies all natural gas to the facility. This line then divides to supply various functions including the boiler. We are exploring various means of estimating the proportion of daily gas usage by the boiler. Standby fuel oil quantity, when used, can be determined by sticking the oil storage tank.

Response 11:

The NSPS requires that the amount and type of fuel be recorded daily for this boiler that is rated at more than ten (10) million British thermal units per hour. The amount of natural gas burned in the boiler can be estimated by prorating to the size of the other natural gas facilities.Therefore, no changes to Condition D.2.4(b) are permissible under the NSPS.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

Condition B.8 Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an

action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(~~b~~c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(~~c~~d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Meridian Automotive Systems**
Source Location:	**1890 Riverfork Drive West, Huntington, Indiana 46750**
County:	**Huntington**
SIC Code:	**3089**
Operation Permit No.:	**T 069-5943-00043**
Permit Reviewer:	**Craig J. Friederich**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Meridian Automotive Systems, Inc. relating to the operation of a high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) automatic spray booth, identified as SB-M-Pr, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 4, capacity: 530 fiberglass reinforced parts per day.

(b) One (1) automatic spray booth, identified as SB-A-Pr, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 6 and EP 7, capacity: 530 fiberglass reinforced parts per day.

(c) One (1) splatter coat spray booth, identified as SB-M-S, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 3, capacity: 530 fiberglass reinforced parts per day.

(d) One (1) splatter coat spray booth, identified as SB-A-S, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 1 and EP 2, capacity: 530 fiberglass reinforced parts per day.

(e) One (1) mono coat spray booth, identified as SB-A-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 5, capacity: 530 fiberglass reinforced parts per day.

(f) One (1) mono coat spray booth, identified as SB-M-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 8, capacity: 530 fiberglass reinforced parts per day

(g) One (1) natural gas fired hook oven, identified as AFT-1, installed in 1995, exhausted to Stack EP 10, rated at 1.1 million British thermal units per hour, capacity: 40 pounds of

waste per hour.

(h) One (1) warehouse booth alpha, identified as S/ECB-Alpha, equipped with air atomization spray guns and dry filters as overspray control, installed in 1995, exhausted to Stack EP 11, capacity: 24 fiberglass reinforced parts per day.

(i) One (1) warehouse booth beta, identified as S/ECB-Beta, equipped with air atomization spray guns and dry filters as overspray control, installed in 1995, exhausted to Stack EP 12, capacity: 24 fiberglass reinforced parts per day.

(j) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.

(k) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.

(l) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.

(m) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.

(n) One (1) natural gas fired west plant air make up unit, identified as AMU-W, installed in 1987, rated at 12.6 million British thermal units per hour.

(o) One (1) fiberglass mat natural gas curing oven, identified as PFO-2, installed in 2001, exhausting outside the plant, rated at 2.39 million British thermal units per hour, drying a maximum of 440 pounds of fiberglass mat per hour.

(p) One (1) natural gas fired boiler, identified as 8409, equipped with low NO_x burners with flue gas recirculation, installed in 2000, exhausted through Stack EP 9, rated at 10.5 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(q) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.

(r) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.

(s) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.

(t) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.

(u) One (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, installed in

1999, exhausting to stack EP 13, rated at 2.39 million British thermal units per hour, with a throughput of 440 pounds of fiberglass per hour.

Emission Units Removed From Source

(v) One (1) Vacuum Assisted reinforced plastic molding press, identified as PR 2063, maximum capacity: 2000 tons.

(w) One (1) Vacuum Assisted reinforced plastic molding press, identified as PR 2566, maximum capacity: 2500 tons.

(x) One (1) Vacuum Assisted reinforced plastic molding press, identified as PR 2567, maximum capacity: 2500 tons.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) east plant air make up unit with a capacity of 8.4 million British thermal units per hour.

(2) One (1) prime manual booth air make up unit with a capacity of 4.226 million British thermal units per hour.

(3) One (1) base manual booth air make up unit with a capacity of 2.958 million British thermal units per hour.

(4) One (1) clear manual booth air make up unit with a capacity of 2.958 million British thermal units per hour.

(5) One (1) flash off air make up unit with a capacity of 2.958 million British thermal units per hour.

(6) One (1) prime auto air make up unit with a capacity of 5.811million British thermal units per hour.

(7) One (1) b/b auto air make up unit with a capacity of 5.811 million British thermal units per hour.

(8) One (1) c/c auto air make up unit with a capacity of 5.811 million British thermal units per hour.

(9) One (1) paint kitchen #1 air make up unit with a capacity of 0.4 million British thermal units per hour.

(10) One (1) paint kitchen #2 air make up unit with a capacity of 0.6 million British

thermal units per hour.

(11) Seventeen (17) plant unit heaters with a capacity of 4.25 million British thermal units per hour, total.

(12) Four (4) office furnaces with a capacity of 0.48 million British thermal units per hour, total.

(13) Three (3) color bake off ovens, identified as BO-1 through BO-3, capacity: 2.0 million British thermal units per hour, each.

(14) Three (3) paint prime ovens, identified as BO-4 through BO-6, capacity: 2.0 million British thermal units per hour, each.

(15) Two (2) dry off ovens, identified as Dry-1 and Dry-2, capacity: 3.0 million British thermal units per hour, each.

(16) Paint storage building heaters with a capacity of 0.055 million British thermal units per hour, total.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(e) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(g) Closed loop heating and cooling systems.

(h) Infrared cure equipment.

(i) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Heat exchanger cleaning and repair.

(l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(m) Paved and unpaved roads and parking lots with public access.

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(p) On-site fire and emergency response training approved by the department.

(q) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38EC).

(r) Activities with emissions equal to or less than the following thresholds: Lead (Pb): 0.6 tons per year or 3.29 pounds per day, SO_2: five (5) pounds per hour or twenty-five (25) pounds per day, NO_X : five (5) pounds per hour or twenty-five (25) pounds per day, CO: twenty-five (25) pounds per day, PM: five (5) pounds per hour or twenty-five (25) pounds per day, and VOC: three (3) pounds per hour or fifteen (15) pounds per day:

(1) Drilling, trimming, sanding of fiberglass reinforced plastic parts, capacity: 530 fiberglass reinforced plastic parts per day.

(2) Bonding of fiberglass reinforced plastic parts with a two part non-VOC compound, capacity: 530 fiberglass reinforced plastic parts per day.

(3) Fiberglass reinforced plastic parts washer (No VOC emissions- detergent and DI water), capacity: 530 fiberglass reinforced plastic parts per day.

(s) A laboratory as defined in 326 IAC 2-7-1(21)(D), including:

(1) One (1) electric QA lab oven

(2) One (1) QA lab color match sprayout booth, identified as SB-kit, equipped with air atomization spray applicators and dry filters for overspray control.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Registration, issued July 11, 1984;

(b) PC (35) 1713, Construction permit issued on November 10, 1988

(c) 35-10-92-0170, Operation permit issued on November 28, 1988;

(d) 069-1857-00033, Construction permit, issued on November 10, 1990;

(e) 069-2046-00033, Exemption, issued on August 9, 1991.

(f) 069-3604-00043, Exemption, issued on April 4, 1994;

(g) 069-3739-00043, Exemption issued on June 3, 1994;

(h) 069-4566-00043, Exemption, issued on June 16, 1995;

(i) 069-5375-00043, Registration issued on March 12, 1996;

(j) A069-8879-00043, Amendment and Name Change issued on October 21, 1997; and

(k) Minor Source Modification 069-12838-00043, issued December 1, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 29, 1996. Additional information was received on October 31, 2000, January 15, 2001, and March 16, 2001.

Emission Calculations

See Appendix A (pages 1 through 17 of 17) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	**Potential To Emit** (tons/year)
PM	103
PM_{10}	106
SO_2	1.29
VOC	309
CO	35.1
NO_X	41.3

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Benzene	0.0002
Dichlorobenzene	0.0001
Formaldehyde	0.354
Hexane	0.185
Toluene	0.0004
Lead	0.00005
Cadmium	0.0001
Chromium	0.0001
Manganese	0.00004
Nickel	0.0002
Xylene	69.0
Ethyl benzene	35.3
Styrene	51.2
Hexamethylene diisocyanate	0.687
Additional HAPs From Insignificant Activities	5.00
TOTAL	162

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAQ emission data.

Pollutant	**Actual Emissions** (tons/year)
PM	not reported
PM_{10}	not reported
SO_2	not reported
VOC	92.7
CO	not reported
NO_X	not reported
HAPS	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Six (6) Spray Booths (SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, SB-A-S)	0.059	0.059	0.00	248.4* Less** than 239.2, combined	0.00	0.00	96.5
Warehouse Booths (S/ECB-Alpha and S/ECB-Beta)	0.017	0.017	0.00		0.00	0.00	8.70
Eleven (11) Reinforced Plastic Molding Presses	0.00	0.00	0.00		0.00	0.00	51.2
One (1) Natural Gas-Fired Preform Oven (PFO-1)	0.020	0.078	0.006		0.862	1.03	0.019
One (1) Natural Gas-Fired Curing Oven (PFO-2)	0.020	0.078	0.006		0.862	1.03	0.019

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
One (1) Boiler known as 8409	0.087	0.350	0.028	0.253	3.86	1.47	0.087
One (1) West Plant Air Make Up Unit	0.105	0.419	0.033	0.304	4.64	5.52	0.104
One (1) Hook Oven (AFT-1)	0.613	0.00	0.219	0.263	0.876	0.263	0.00
Insignificant Activities	26.0	28.0	1.00	10.0	24.0	32.0	5.00
Total Emissions	26.9	28.8	1.28	Source-Wide limit less than 250 tpy	33.4	41.3	157.2

* BACT limit pursuant to CP 069-1857-0033, issued November 10, 1990 for the six (6) spray booths.

** Total VOC emissions from surface coating booths, warehouse booths, molding presses, preform oven and the curing oven.

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The one (1) natural gas fired hook oven, identified as AFT-1, is not subject to NSPS Subpart E (40 CFR Part 60.50) and 326 IAC 12, because the paint residues being combusted do not meet the definition of solid waste as defined by 40 CFR Part 60.51(b).

(b) The one (1) natural gas fired hook oven, identified as AFT-1, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart EEE because the hook oven is an industrial furnace process which is exempt from this rule.

(c) The 10.5 million British thermal units per hour rated boiler, 8409, installed in 2000, is subject to the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.40, Subpart Dc - Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units) since the boiler was constructed after June 9, 1989 and is rated between 10 and 100 million British thermal units per hour. The amount and type of fuel combusted each day must be recorded.

(d) The one (1) Fiberglass reinforced plastic parts washer, which is used to wash plastic parts prior to painting, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460), Subpart T, because it does not use any halogenated solvents. This unit uses non-VOC containing detergents and de-ionized water.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

In order to remain a minor source pursuant to 326 IAC 2-2 (PSD), Meridian Automotive Systems has agreed to a source-wide VOC emissions limit of less than two-hundred fifty (250) tons per twelve (12) consecutive months, including insignificant activities.

326 IAC 2-4.1-1 (New Source Toxics Control)

The one(1) 2,500 ton reinforced molding press, identified as PR-2502, the four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, the one (1) 600 metric ton reinforced plastic molding press, identified as PR-808, the one (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, the one (1) preform oven, identified as PFO-1, and the one (1) curing oven, identified as PFO-2, were constructed in 2000. Since the potential to emit each individual hazardous air pollutant (HAP) is less than ten (10) tons per year and the potential to emit total HAPs is less than a total of twenty-five (25) tons per year, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the

source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) natural gas fired boiler, identified as 8409, installed in 2000, rated at 10.5 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitation is based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The total heat input capacity for the source, including the 10.5 million British thermal units per hour boiler, is 10.5 million British thermal units per hour.

$Pt = 1.09/(10.5)^{0.26} = 0.592$lb/mmBtu heat input

Based on Appendix A, the potential PM emission rate is:

0.087 ton/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.020lb/hr
(0.020 lb/hr / 10.5 mmBtu/hr) = 0.0019lb PM per mmBtu

The PM emissions from the one (1) natural gas fired boiler are 0.0019 pound PM per million British thermal units per hour, which is less than the allowable of 0.592 pound per million British thermal units per hour. Therefore, the one (1) natural gas fired boiler is in compliance with this rule.

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the one (1) automatic spray booth, identified as SB-M-Pr, the one (1) automatic spray booth, identified as SB-A-Pr, the one (1) splatter coat spray booth, identified as SB-M-S, the one (1) splatter coat spray booth, identified as SB-A-S, the one (1) mono coat spray booth, identified as SB-A-M, and the one (1) mono coat spray booth identified as SB-M-M, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The waterwash system shall be in operation at all times these spray booths are in operation, in order to comply with this limit.

(b) The particulate matter (PM) from the two (2) warehouse booths, identified as S/ECB-Alpha and S/ECB-beta, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times these spray booths are in operation, in order to comply with this limit.

(c) The particulate matter (PM) from the fiberglass curing oven, identified as PFO-2, and the fiberglass preform oven, identified as PFO-1, shall be limited to 1.49 pound per hour, each, when operating at a process weight rate of 440 pounds per hour using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-1-6 (New facilities; General reduction requirements)

The fiberglass curing oven, identified as PFO-2, and the fiberglass preform oven, identified as PFO-1, were built after January 1, 1980, but do not have potential to emit VOC greater than twenty-five (25) tons per year. Therefore, neither is subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The eleven (11) reinforced plastic molding presses are not subject to the requirements of 326 IAC 8-1-6 because even though they were built after January 1,1980 none have the potential to emit VOC greater than twenty-five (25) tons per year.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Pursuant to CP 069-1857-0033, issued on November 10, 1990, BACT for the six (6) spray booths, identified as SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, and SB-A-S, is determined to be:

(1) The potential VOC delivered to the applicators shall not exceed 248.4 tons per twelve (12) consecutive month period.

(2) The above-named operations shall be restricted such that they shall not exceed thirty (30) tons per month as a short term limit.

(3) The use of high transfer efficiency electrostatic application is required as a technology which will reduce VOC emissions. Therefore, the State and Federal Rules for Prevention of Significant Deterioration do not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are not applicable to the spray booths because fiberglass reinforced plastic parts are being coated, not metal.

State Rule Applicability -Insignificant Activities

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The fiberglass reinforced plastic parts washer is not subject to the requirements of 326 IAC 8-3 because this washer uses non-VOC containing detergents and de-ionized water to wash plastic parts prior to painting.

Testing Requirements

There is no testing required at this source. Emission calculations are based on standard AP-42 emission factors, material usage, and information from Material Safety Data Sheets.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The six (6) spray booths, identified as SB-M-Pr, SB-A-Pr, SB-M-S, SB-A-S, SB-A-M, and SB-M-M have applicable compliance monitoring conditions as specified below:

(1) Monthly inspections shall be performed of the coating emissions from the six (6) spray booths stack exhausts, known as Stacks EP 1 through EP 8, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Daily inspections shall be performed to verify that the water level of the waterwash system at each spray booth meet the manufacturer's recommended level. To monitor the performance of the waterwash, the water level of the walls shall be maintained weekly at a level which indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the waterwash. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(b) The two (2) warehouse booths, identified as S/ECB-Alpha and S/ECB-Beta, have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the two (2) warehouse booths, identified as S/ECB-Alpha and S/ECB-Beta. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the warehouse booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the warehouse booth stack exhausts, known as Stacks EP 11 and EP 12, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the waterwash system for the six (6) spray booths, and the dry filters for the two (2) warehouse booths must operate properly to ensure

compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this high-pressure fiberglass-reinforced plastics manufacturing and painting source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 069-5943-00043.**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig Friederich**
Date: **May 29, 1996**

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
All Surface Coating Booths (SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, SB-A-S)																
30 Gloss Monocoat Black	8.69	44.00%	0.0%	44.0%	0.0%	45.00%	0.50000	22.080	3.82	3.82	42.21	1013.10	184.89	58.83	8.50	75.0%
Purge Solvent	6.81	10.00%	0.0%	10.0%	0.0%	0.00%	0.00377	22.080	0.68	0.68	0.06	1.36	0.25	0.56	n/a	75.0%
									Control Efficiency	99.90%						
									Uncontrolled		**42.3**	**1014**	**185**	**59.4**		
									Controlled		**42.3**	**1014**	**185**	**0.059**		

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Warehouse Booths S/ECB-Alpha, S/ECB-beta																
30 Gloss Monocoat Black	8.69	44.00%	0.0%	44.0%	0.0%	45.00%	0.50000	2.000	3.82	3.82	3.82	91.77	16.75	15.99	8.50	25.0%
Purge Solvent	6.81	10.00%	0.0%	10.0%	0.0%	0.00%	0.02100	2.000	0.68	0.68	0.03	0.69	0.13	0.85	n/a	25.0%
									Control Efficiency	99.90%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**3.85**	**92.5**	**16.87**	**16.83**		
									Controlled		**3.85**	**92.5**	**16.87**	**0.017**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Hexamethylene diisocyanate	Xylene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexamethylene diisocyanate Emissions (tons/yr)
All Surface Coating Booths (SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, SB-A-S)											
30 Gloss Monocoat Black	8.69	0.50000	22.080	15.00%	0.077%	7.70%	0.150%	63.03	0.32	32.36	0.63
Purge Solvent	6.81	0.00377	22.080	8.00%	0.00%	0.00%	0.00%	0.20	0.00	0.00	0.00
							Individual Total	**63.23**	**0.324**	**32.36**	**0.63**
							Overall Total	**96.54**			

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Hexamethylene diisocyanate	Xylene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexamethylene diisocyanate Emissions (tons/yr)
Warehouse Booths S/ECB-Alpha, S/ECB-beta											
30 Gloss Monocoat Black	8.69	0.50000	2.000	15.00%	0.00%	7.70%	0.150%	5.71	0.00	2.93	0.057
Purge Solvent	6.81	0.00377	2.000	0.00%	0.077%	0.00%	0.00%	0.00	0.0002	0.00	0.00
							Individual Total	**5.71**	**0.0002**	**2.93**	**0.057**
METHODOLOGY							**Overall Total**	**8.70**			

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC, HAP and Particulate
From Closed Molding Operations

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

Material	Weight % Monomer	Usage (lbs/hour)	Flash Off (%)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	%VOC that is Styrene	Potential Styrene Emissions (tons/yr)	Particulate Potential (tons/yr)	Transfer Efficiency
SMC Molding										
PR-810 installed in 1987(Fenders)	25.00%	279	3.0%	2.09	50.22	9.17	100%	9.17	0.00	100%
PR-1509 installed in 2000(Fenders)	25.00%	558	3.0%	4.19	100.44	18.33	100%	18.33	0.00	100%
PR-1511installed in 1987), PR-1512 installed in 2000 (Fenders)	25.00%	558	3.0%	4.19	100.44	18.33	100%	18.33	0.00	100%
	Uncontrolled VOC (SMC Molding):			**10.5**	**251**	**45.8**		**45.8**	**0.00**	
Material	Weight % Monomer	Usage (lbs/hour)	Flash Off (%)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	%VOC that is polyol	Potential Polyol Emissions (tons/yr)	Particulate Potential (tons/yr)	Transfer Efficiency
SRIM Molding										
PR-3001 installed in 1990(Truck Bed)	6.04%	221	3.0%	0.40	9.61	1.75	100%	1.75	0.00	100%
PR-2502 installed in 2000(Truck Bed)	6.04%	221	3.0%	0.40	9.61	1.75	100%	1.75	0.00	100%
PR-1503 installed in 2000(Mid and Tail Gate)	6.04%	45.6	3.0%	0.08	1.98	0.36	100%	0.36	0.00	100%
PR-1504 installed in 2000(Mid and Tail Gate)	6.04%	45.6	3.0%	0.08	1.98	0.36	100%	0.36	0.00	100%
PR-1505 installed in 2000(Mid and Tail Gate)	6.04%	45.6	3.0%	0.08	1.98	0.36	100%	0.36	0.00	100%
PR-1506 installed in 2000 (Mid and Tail Gate)	6.04%	45.6	3.0%	0.08	1.98	0.36	100%	0.36	0.00	100%
PR-1507 installed in 1987 (Mid and Tail Gate)	6.04%	22.1	3.0%	0.04	0.96	0.18	100%	0.18	0.00	100%
PR-808 installed in 2000 (Tail Gate Piece)	6.04%	25.0	3.0%	0.05	1.09	0.20	100%	0.20	0.00	100%
State Potential Emissions	**Uncontrolled VOC (SRIM Molding):**			**1.22**	**29.2**	**5.33**		**5.33**	**0.00**	
			Total VOC:	**11.7**	**280**	**51.2**		**51.2**	**0.00**	

METHODOLOGY

Potential VOC Pounds per Hour = Pounds of material used for each part * Parts per hour * monomer content * flash off
Potential VOC Tons per Year = Potential VOC Pounds per hour * 8760 hrs/yr / 2000 lbs/ton
Particulate Potential Tons per Year = (units/hour) * (lbs/unit) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Styrene Potential Tons per Year = VOC tons per year * % VOC that is Styrene

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
One (1) Boiler (8409) **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.50	91.98

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	32.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.087	0.350	0.028	1.47	0.253	3.86

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
One (1) Boiler (8409) **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.658E-05	5.519E-05	3.449E-03	8.278E-02	1.564E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	2.300E-05	5.059E-05	6.439E-05	1.748E-05	9.658E-05	0.087

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Incinerator

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 003-5943**
Plt ID: **003-00043**
One (1) Hook Oven (AFT-1) **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

THROUGHPUT lbs/hr
40

THROUGHPUT tons/yr
175.2

	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	0.613	0.219	0.876	0.263	0.263

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
West Plant Air Make Up Unit **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.60	110.38

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.105	0.419	0.033	5.519	0.304	4.636

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 8 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

HAPs Emissions
Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
West Plant Air Make Up Unit **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.159E-04	6.623E-05	4.139E-03	9.934E-02	1.876E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPS
Potential Emission in tons/yr	2.759E-05	6.071E-05	7.726E-05	2.097E-05	1.159E-04	0.104

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Process Emissions Calculations
VOC from One (1) Natural Gas-Fired Preform Oven (PFO-1)

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig Friederich**
Date: **May 29, 1996**

Weight per mat	44 pounds
Percent resin(binder)	15%
Mats per day	240 units
Volatilization at 225 C	24 ppm
Volatilization ratio	0.078

The ratio of volatilization at 225 C to that at 300 C yields a percent of the binder that can be presumed to be volatilization. Assumption is that at the maximum temperature of 300 C the binder is 100% volatilized

Process Rate = units per day/24 x pounds per unit
= 440 pounds per hour

Emissions =Process rate lb/hr x 24hr/day x 1/2000 x resin % /100 x days/year x volatilization ratio
= 22.53 tons of VOC per year

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

One (1) Preform Oven (PFO-1)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.39	20.53

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.020	0.078	0.006	1.027	0.056	0.862

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 11 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

One (1) Preform Oven (PFO-1)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.156E-05	1.232E-05	7.699E-04	1.848E-02	3.490E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	5.133E-06	1.129E-05	1.437E-05	3.901E-06	2.156E-05	0.019

Methodology is the same as page 10.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Process Emissions Calculations
VOC From One (1) Curing Oven (UNK)
Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig Friederich**
Date: **May 29, 1996**

Weight per mat	44 pounds
Percent resin(binder)	15%
Mats per day	240 units
Volatilization at 225 C	24 ppm
Volatilization ratio	0.078

The ratio of volatilization at 225 C to that at 300 C yields a percent of the binder that can be presumed to be volatilization. Assumption is that at the maximum temperature of 300 C the binder is 100% volatilized

Process Rate = units per day/24 x pounds per unit
= 440 pounds per hour

Emissions =Process rate lb/hr x 24hr/day x 1/2000 x resin % /100 x days/year x volatilization ratio
= 22.53 tons of VOC per year

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

One (1) Curing Oven (UNK)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.39	20.53

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.020	0.078	0.006	1.03	0.056	0.862

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 14 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

One (1) Curing Oven (UNK)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.156E-05	1.232E-05	7.699E-04	1.848E-02	3.490E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	5.133E-06	1.129E-05	1.437E-05	3.901E-06	2.156E-05	0.019

Methodology is the same as page 13.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Insignificant Activities **Reviewer:** **Craig J. Friederich**
Date: **May 29, 1996**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
62.72	549.43

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.522	2.09	0.165	27.5	1.51	23.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 16 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Activities
HAPs Emissions

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.769E-04	3.297E-04	2.060E-02	4.945E-01	9.340E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.374E-04	3.022E-04	3.846E-04	1.044E-04	5.769E-04	0.518

Methodology is the same as page 15.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Company Name: **Meridian Automotive Systems**
Address City IN Zip: **1890 Riverfork Drive West, Huntington, Indiana 46750**
Part 70: **T 069-5943**
Plt ID: **069-00043**
Reviewer: **Craig J. Friederich**
Date: **May 29, 1996**

Summary of Emissions

Uncontrolled Potential Emissions

Emission Unit	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	HAPS (tons/yr)
Six (6) Spray Booths	59.4	59.4	0.00	0.00	185	0.00	96.5
Two (2) Warehouse Booths	16.83	16.83	0.00	0.00	16.87	0.00	8.70
One (1) Boiler (8409)	0.087	0.35	0.028	1.47	0.253	3.86	0.087
One (1) Hook Oven (AFT-1)	0.613	0.613	0.219	0.263	0.263	0.876	0.00
Eleven (11) Reinforced Plastic Molding Presses	0.00	0.00	0.00	0.00	51.2	0.00	51.2
One (1) Natural Gas-Fired Preform Oven (PFO-1)	0.020	0.078	0.006	1.03	22.6	0.862	0.019
One (1) Natural Gas-Fired Curing Oven (PFO-2)	0.020	0.078	0.006	1.03	22.6	0.862	0.019
West Plant Air Make-Up Unit	0.105	0.419	0.033	5.52	0.304	4.64	0.104
Insignificant Activities	26.0	28.0	1.00	32.0	10	24.0	5.00
Total	**103.1**	**105.8**	**1.29**	**41.3**	**309**	**35.1**	**162**

Controlled Emissions (Including All Limits)

Emission Unit	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	HAPS (tons/yr)
Six (6) Spray Booths	0.059	0.059	0.00	0.00	248.4 BACT Limit For Spray Booths combined for Spray Booths, Warehouse Booths, Molding, Preform Oven, Curing Oven	0.00	96.5
Two (2) Warehouse Booths	0.017	0.017	0.00	0.00		0.00	8.70
Eleven (11) Reinforced Plastic Molding Presses	0.00	0.00	0.00	0.00		0.00	51.2
One (1) Natural Gas-Fired Preform Oven (PFO-1)	0.020	0.078	0.006	1.03		0.862	0.019
One (1) Natural Gas-Fired Curing Oven (PFO-2)	0.020	0.078	0.006	1.03		0.862	0.019
One (1) Boiler (8409)	0.087	0.35	0.028	1.47	0.253	3.86	0.087
West Plant Air Make-Up Unit	0.105	0.419	0.033	5.52	0.304	4.64	0.104
One (1) Hook Oven (AFT-1)	0.613	0.613	0.219	0.263	0.263	0.876	0.00
Insignificant Activities	26.0	28.0	1.00	32.0	10	24.0	5.00
Total	**26.9**	**29.6**	**1.29**	**41.3**	**Source-wide limit <250 tpy**	**35.1**	**162**